

K&L GATES

May 23, 2024

By ECF

The Honorable Gregory H. Woods
United States District Court
for the Southern District of New York
Daniel Patrick Moynihan United States
Courthouse
500 Pearl Street, Room 2260
New York, NY 10007

Re: USA v. Kostin, et al., Case No. 24-cr-00091-GHW

Dear Judge Woods:

Following oral argument on May 9, 2024, the parties have reached an agreement in principle that is designed to resolve deficiencies in the government's filter team process presented in Defendant Wolfson's Motion to Modify Filter Team Procedures and for Injunction Against Release or Review of Records Pending Ruling, Dkt. No. 39. Accordingly, Defendant Wolfson does not anticipate that further briefing will be required and therefore withdraws his motion without prejudice.

Respectfully submitted,

/s/ David C. Rybicki

David C. Rybicki

Counsel for Vadim Wolfson